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ROBINSON MCFADDEN
ATTORNEYS AND COUNSELORS AT LAW

ROBINSON, MCFADDEN & MOORE, P.C.

COLUMBIA | GREENVILLE

February 22, 2005

HAND DELIVERED

Mr. Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Synergy Business Park, Saluda Building
101 Executive Center Drive
Columbia, SC 29210

Bonnie D. Shealy
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Re: BellSouth Transit Traffic Service Tariff filed 2/2/05
Our File No. 19336-0014

Tariff 2005 50
Docket - 2005-63 C

Dear Mr. Terreni:

Enclosed for filing on behalf of the South Carolina Cable Television Association please find a Complaint and Petition to Intervene in the above referenced BellSouth's Transit Traffic Service Tariff Filing No. SC2004-138 filed February 2, 2005. By copy of this letter we are serving the same on other counsel who have petitioned the Commission on this matter. Please stamp the extra copies provided as proof of filing and return them with our courier. Should you need any additional information, please contact me.

RECEIVED
2005 FEB 22 PM 2:02
SC PUBLIC SERVICE
COMMISSION

Very truly yours,

ROBINSON, MCFADDEN & MOORE, P.C.

Bonnie D. Shealy
Bonnie D. Shealy

/bds

Enclosures

cc/enc:

Ms. Nancy Horne
Dan F. Arnett, ORS Chief of Staff
Patrick Turner, Esquire
M. John Bowen, Jr., Esquire
Margaret M. Fox, Esquire
John J. Pringle, Jr., Esquire
Florence Belser, ORS General Counsel
Ms. Daphne Werts (via email)

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2005 FEB 22 PM 2:02
SC PUBLIC SERVICE
COMMISSION

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

IN RE:

BellSouth Telecommunications, Inc.
Transit Traffic Service Tariff No. SC2004-138
filed February 2, 2005

**COMPLAINT AND
PETITION TO INTERVENE**

The South Carolina Cable Television Association ("SCCTA") hereby complains and petitions the Public Service Commission of South Carolina ("Commission"), pursuant to 26 S.C. Regs. 103-835 and 103-836 and other applicable rules and regulations of the Commission for permission to participate in any proceeding established to address the Transit Traffic Service Tariff filing of BellSouth Telecommunications, Inc. ("BellSouth"). In support of this Petition, SCCTA would show the following:

1. SCCTA is a nonprofit corporation, organized and existing pursuant to the laws of the State of South Carolina, representing over one hundred franchised cable television systems operating within South Carolina.

2. SCCTA's authorized representatives in this proceeding are as follows:

SCCTA OFFICIAL

Ms. Nancy Horne
South Carolina Cable Television Association
6175 Barfield Road, Suite 200
Atlanta, Georgia 30328

and

LEGAL REPRESENTATIVES

Frank R. Ellerbe, III, Esquire
Bonnie D. Shealy, Esquire
Robinson, McFadden & Moore, P.C.
1901 Main Street, Suite 1500
Post Office Box 944
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3. BellSouth filed a new proposed tariff offering that establishes the rates, terms and conditions for BellSouth's Transit Traffic Service in the General Subscriber Service Tariff. According to the tariff filing, BellSouth provides transit traffic service when the call is originated and terminated by a service provider other than BellSouth and BellSouth transports the call between the originating and terminating carriers.

4. SCCTA has an interest in the above-captioned proceeding inasmuch as SCCTA's members are potential providers and providers of competitive local exchange services in South Carolina who must use BellSouth's transit services to interconnect with other local carriers. SCCTA hereby requests permission to intervene in the above-captioned proceeding as a formal party of record.

5. SCCTA's intervention will aid the Commission by assisting in the development of a full and fair record to address the issues raised in this proceeding. SCCTA's position in this docket is that the Commission should adopt reasonable and non-discriminatory policies for the provision of transit traffic services, interconnection, and related services which are structured to allow CLECs to compete effectively in the market for local services.

6. SCCTA is informed and believes that granting its request to be made a party of record in the above-captioned proceeding is in the public interest, is consistent

with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing the views and concerns of SCCTA can be developed.

WHEREFORE, SCCTA prays for the following relief:

A. That this Petition to Intervene be granted by the Commission and that SCCTA be made a formal party of record to the proceeding.

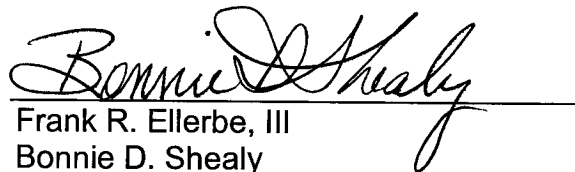
B. That SCCTA be allowed to participate fully in this proceeding and to take such positions as it deems advisable.

C. That such other and further relief be granted as is just and proper.

Dated this 22nd day of February, 2005.

ROBINSON, McFADDEN & MOORE, P.C.

By



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Attorneys for South Carolina Cable Television
Association

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

In Re:

BellSouth Telecommunications,
Inc. Transit Traffic Service Tariff
No. SC2004-138 filed February 2,
2005

CERTIFICATE OF SERVICE

This is to certify that I, Mary F. Cutler, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the persons named below the **Complaint and Petition to Intervene** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

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Office of Regulatory Staff
1441 Main Street, 3rd Floor
Columbia, SC 29201

Dated at Columbia, South Carolina this 22nd day of February 2005.


Mary F. Cutler